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AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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FAA-99-5401-11

U.S. Department of Transportation Dockets
Room Plaza 401
400 Seventh Street, SW
Washington, D.C. 20590

Re: Docket No. FAA-1999-5401 ; Notice 99-02, Aging Airplane Safety

Ladies and Gentlemen:

The Air Line Pilots Association (ALPA), representing the safety interests of 53,000 professional airline pilots flying for 51 airlines in the United States and Canada, has reviewed and supports the Federal Aviation Administration's (FAA) referenced notice of proposed rule that proposes to require all airplanes operated under Federal Aviation Regulations (FAR) Part 121, Part 129, and all multi-engine airplanes used in scheduled operations under 14 CFR Part 135 to undergo record reviews and inspections by the Administrator after a fixed repeat interval of 14-years in service, to ensure that the maintenance of these airplanes' age-sensitive parts and components has been adequate and timely. This proposal also permits certain representatives of the Administrator to conduct these inspections. The proposed rule also would prohibit operation of these airplanes after specified deadlines unless damage-tolerance-based inspections and procedures are included in their maintenance or inspection program. ALPA acknowledges that the Aging Airplane Safety NPRM published on October 5, 1993 (58 FR 51944) is withdrawn.

ALPA understands that this proposal was prompted by the FAA taking a critical step toward compliance with the Aging Aircraft Safety Act of 1991. We also understand that the actions specified are intended to help ensure the continuing airworthiness of aging airplanes operating in air transportation by applying modern damage-tolerance analysis and inspection techniques to older airplane structures that were certificated before such techniques were available, and through mandatory aging aircraft records reviews and inspections to be performed by the Administrator.

The continued safe operation of these model airplanes is essential. Thank you for the opportunity to comment.

Sincerely,

Richard D. Kessel
Staff Engineer
Engineering & Air Safety Department

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